

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
Sanders, Tilda A.
Debtors/ Respondents : 17-16836

RESPONSE TO CERTIFICATE OF DEFAULT

Debtor, Tilda A. Sanders by and through her undersigned attorney, hereby provides the following response to the Certificate of Default filed by MIDFIRST BANK f.k.a. AmeriHome Mortgage Company, LLC ("Movant"). This response is made without prejudice to debtor's right to present additional facts or contentions at trial based upon information hereinafter obtained or evaluated. Debtors specifically reserves the right to supplement or amend their responses or present additional facts and contentions at a later date to any of the answers given.

Debtor claims, pursuant to the approved stipulation, to date, she never received a 15 day Notice of Default from Movant. In addition, Debtor claims. Notwithstanding the aforementioned, as of the date of this Certificate, the debtor has remedied or is prepared to remedy whatever problems served as grounds for relief from the stay in the first instance.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtors pray that the request for relief be denied and such other relief as is just and proper. The Debtors specifically reserve the right to supplement the response at or prior to a hearing thereon.

Dated: June 17, 2019

"/s/" Mitchell J. Prince
John L. Mc Clain, Esquire
Mitchell J. Prince, Esquire
Attorneys for Debtor
P.O. Box 123
Nrberth, PA 19072
(215) 893-9357